

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

Plaintiffs' Master Administrative Long-Form Complaint and:

Robert Holt, et al. v. National Football League, et al. (Plaintiffs Kenyon Rasheed and Traci Wiedenfeld-Rasheed ONLY)

Court File No. 2:12-cv-04185-AB

**MOTION FOR LEAVE TO
WITHDRAW AS COUNSEL
FOR PLAINTIFFS KENYON
RASHEED AND TRACI
WIEDENFELD-RASHEED**

J. Gordon Rudd, Jr., Brian C. Gudmundson, and Michael J. Laird of Zimmerman Reed LLP ("Plaintiffs' Counsel"), move this Court pursuant to Pennsylvania Rule of Professional Conduct 1.16(b)(1) and United States District Court for the Eastern District of Pennsylvania Local Rule of Civil Procedure 5.1(c) to withdraw as counsel in relation to the claims of Kenyon Rasheed and Traci Wiedenfeld-Rasheed only in this action, and state as follows:

1. Plaintiffs' counsel filed the action *Robert Holt, et al. v. National Football League, et al.*, No. 2:12-cv-04185-AB, in the Eastern District of Pennsylvania on July 23, 2012, for the benefit of several retired National Football League players, including Kenyon Rasheed and Traci Wiedenfeld-Rasheed.
2. Plaintiffs' counsel filed a short form complaint for Kenyon Rasheed and Traci Wiedenfeld-Rasheed on August 20, 2012.

3. Despite the efforts of the undersigned on Plaintiffs' behalf, Plaintiffs' have advised Zimmerman Reed LLP that they no longer want Zimmerman Reed to represent them moving forward.

4. Zimmerman Reed properly notified Kenyon Rasheed and Traci Wiedenfeld-Rasheed of counsel's intention to withdraw from representing them in this matter.

5. Under the circumstances, it is apparent that the undersigned must move the Court for leave to withdraw as counsel.

WHEREFORE, Plaintiffs' counsel respectfully requests this Court for leave to withdraw as counsel for Kenyon Rasheed and Traci Wiedenfeld-Rasheed only in Court File No. 2:12-cv-04185-AB.

Dated: April 7, 2022

Respectfully submitted,

ZIMMERMAN REED LLP

s/ Brian C. Gudmundson
J. Gordon Rudd, Jr. (#222082)
Brian C. Gudmundson (#336695)
Michael J. Laird (#0398436)
1100 IDS Center, 80 South 8th Street
Minneapolis, MN 55402
Telephone: (612) 341-0400
Facsimile: (612) 341-0844
Gordon.Rudd@zimmreed.com
Brian.Gudmundson@zimmreed.com
Michael.Laird@zimmreed.com